



2GR0154620090916

WYANDOT HAWKEYE PLANT #504

2GR01546 2009/09/16 HABLITZEL, LYNETTE UPPER SANDUS



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korteski, Director

Re: Wyandot County
KMI - Hawkeye Plant # 504
Industrial
Storm Water

September 16, 2009

Mr. Ralph Kyanko
Kokosong Materials
17531 Waterford Road
Fredericktown, Ohio 43019

Dear Mr. Kyanko:

On August 24, 2009, Walter Ariss and I inspected KMI Hawkeye Plant #504, at 6326 County Highway 61, Upper Sandusky, Ohio. The facility is located on land leased from The Olen Corporation. The purpose of our visit was to evaluate compliance of the site with the National Pollutant Discharge Elimination System (NPDES) permit for storm water discharges associated with industrial activity, Facility ID No. 2GR01546. Photos were taken. Mr. Mike Thompson, Plant Manager, and Mr. Chuck Mull, Field Engineer, were present to provide information. As a result of the inspection, I have the following comments:

1. The facility is a hot mix asphalt plant with a primary Standard Industrial Classification (SIC) code of 2951. NPDES permit coverage was granted May 2, 2008.
2. A Storm Water Pollution Prevention Plan (SWP3) was available onsite and dated May 14, 2008. The last comprehensive evaluation was dated October 21, 2008. The document did list the Pollution Prevention Team, the material inventory, and include a site map. However, the site map did not show the locations of the Truck Soap Area (where the asphalt release agent, Chemstation Product 5896, is sprayed on the trucks), the asphalt millings and the sand stockpiles, or the equipment storage area northeast of the plant at the edge of the stone parking area. Drainage arrows showed runoff draining to the south and the west, however, land east of the millings stockpile drains east toward County Highway 61 and to the south where a catch basin conveys flow into Olen's quarry. The site map must be updated to include this information. *The missing details are a violation of Part IV.D.2.a. of the permit.*

Weekly inspection logs were signed and dated from April 17, 2009, when the plant started its operating season, to August 24, 2009.

Employee Training records are kept at the main office and were not available for review. It was reported that employee training is conducted every spring. Topics covered include: spill response, review of weekly and daily inspection requirements. A copy of this information should be maintained onsite with the SWP3.

3. Manufacturing equipment (mixing drum, bag house, conveyers, asphalt silos, truck soap station) is located outside as well as most material storage. Industrial activities with potential exposure of pollutants to storm water include: the material stockpiles; material loading and unloading activities at the cold feed and recycled asphalt pavement bins, at the truck load out area; the Truck Soap Area, and the filling of the asphalt, used oil and diesel storage tanks. Aggregate stockpiles onsite are owned by Olen until the time KMI takes material for use.

Storage of hydraulic oils occurs in the Tool Trailer which has secondary containment. Spill response materials, such as absorbent pads, booms, and peat moss were located in this trailer. At the time of our visit, there was some oil dripping off the chain that rotates the drum. The chain is oiled once per week. However, pads were in place to capture the material.

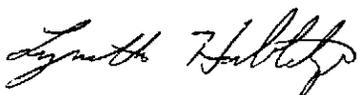
4. The NPDES permit requires that the SWP3 describe and insure implementation of Best Management (BMPs) practices. These BMPs must address several different components of facility operations that are listed in the permit. The only BMP implementation issue at the time of our visit was a need to improve on self inspections. Several Naptha containers were located southeast of the millings stockpile. They were open with a small amount of liquid present. However, there was white staining on the ground from this location and towards the east, indicating that some liquid material had flowed across the area. The Naptha was reported to be Olen's material, related to their adjacent asphalt operations. While we were onsite, KMI contacted Olen who was going to address the open containers. However, KMI's routine inspections around their millings stockpile should have documented this release and prompted earlier action. Please insure that all areas of the facility are observed during inspections. The SWP3 must have procedures in place to address releases, even when they are not caused by KMI.

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Within 10 days of the date on this letter, please submit to this office **written notification** as to the actions taken or proposed to address the compliance issues noted in Items 2 and 4. Your response should include the dates, either actual or proposed, for the completion of the actions.

If there are any questions, please contact me at (419) 373-3009.

Sincerely,



Lynette M. Hablitzel, P.E.
Division of Surface Water
Storm Water Section

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pc: ~~DSW-NWDO-File~~

ec: Chuck Mull, Kokosing, cjm2@kokosing.biz